



Oregon

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September 25, 2012

Hugh Roche
United States Postal Service Western FSO
7500 East 53rd Place, Room 1108
Denver, CO 80266-9918

Re: Conditional No Further Action Determination
USPS Portland Processing & Distribution Center (P&DC)
ECSI# 2183

Mr. Roche:

The Oregon Department of Environmental Quality (DEQ) has completed review of all documentation related to investigation and cleanup activities at the United States Postal Service (USPS) Processing & Distribution Center (P&DC) site located at 715 NW Hoyt Street in Portland, Oregon. Review included Exponent's April 12, 2012 *Final Closure Report* documenting remedial activities completed as stipulated in DEQ's 2011 Record of Decision for the site, and ongoing site maintenance such as a May 31, 2012 report of the inspection of the site paving to confirm an adequate cover is present. Environmental investigation and remediation has been completed under a 2003 intergovernmental agreement with USPS.

DEQ has determined that no further action is required to address environmental contamination on the USPS property provided that the site cap is maintained. This conditional NFA determination for the site is based on the regulations and facts as we now understand them, including but not limited to the following:

1. From approximately 1882 to 1974 portions of the site were used for rail purposes. A small gas manufacturing facility operated in the northwest site corner from 1893 to the 1930s. USPS occupied the eastern portion of the site under a lease beginning in the 1960s. In 1974, the USPS acquired full ownership of the entire property, and continues to operate a mail processing and distribution facility on the premises.
2. Environmental investigation has identified chemicals in soil and groundwater related to historical site use. These include volatile and semi-volatile organic compounds and metals.
3. Chemicals exceed DEQ risk-based screening values in a number of site areas, including shallow soil. In that regard, the primary risk is to excavation workers and on-site

occupational (postal) workers if direct contact with contaminants were to occur because the existing site cover was breached or not properly maintained.

4. Given that site soil is covered by site buildings, paving, or landscape materials (in a few small areas), workers are not expected to come into contact with contaminated soil or groundwater. Site paving and structures therefore are considered protective of human health provided they remain in place and are intact.
5. In a 2010 Staff Report, DEQ evaluated site risk and proposed a site remedy for continued USPS use of the site (“Existing Site Use”) consisting of monitoring and maintenance of site capping features; a prohibition on groundwater use; controls on excavation work use of the site; and recording of a deed notice identifying site conditions and controls. The staff report also considered remedial measures should the site be sold and redevelopment occur in the future, including an urban residential use component (“Hypothetical Future Use”). The latter remedy assumed that site buildings and paving would be removed prior to site redevelopment, and requires excavation and off-site disposal of contamination “hot spots” in soil, removal of two pockets of petroleum beneath existing buildings, and re-capping of the site as part of site redevelopment. Public notice of the proposed remedy was issued, after which the remedy was approved by DEQ’s NW Region Administrator. No significant comment was received on the proposed remedy. The Record of Decision was signed by DEQ’s Northwest Region Administrator in July 2010.
6. Significant upgrades to site paving were completed in June 2011 to ensure that the site cap is fully competent and protective. A Contaminated Media Management Plan was updated and approved by DEQ, and an Easement and Equitable Servitudes recorded with the property deed, fulfilling the remedial measures outlined in DEQ’s ROD. A *Closure Report* was approved by DEQ in 2012.
7. Residual risk analysis completed by DEQ, and documented in the July 12, 2012 USPS-P&DC Closeout Memo, indicates that the site does not present a significant risk to public health or the environment provided that site controls are maintained. Annual cap inspection, ongoing cap maintenance, and notification of excavation workers or others when it is necessary to breach the site cover and contact contaminated soil or groundwater. Inspection and repair reports are to be submitted to DEQ per the CMMP. After five years of annual inspections, DEQ will determine whether less frequent cap inspection and reporting is necessary.
8. Public notice of DEQ’s no further action decision for the site was issued on August 1, 2012 and a 30-day period provided for public comment. No comments were received.

DEQ concludes that based on the information presented to date, conditions at the USPS facility are protective of public health and the environment and require no further action under the Oregon Environmental Cleanup Law, ORS 465.200 et seq., unless new or previously undisclosed information indicates that site conditions are different from those summarized above. We will update the Environmental Cleanup Site Information (ECSI) database to reflect this decision.



USPS will notify DEQ if sale of the property occurs, and any new site owner will be required to maintain the existing site cap and follow other protective measures outlined in the ROD. If site redevelopment occurs under the conditions assumed in the ROD, the Hypothetical Future Site Use remedy must be fully implemented under DEQ for the conditional NFA to remain valid.

DEQ recommends keeping a copy of all of the documentation associated with this remedial action with the permanent facility records.

If you have any questions about this letter, please contact Dan Hafley at (503) 229-5417. Thank you for your efforts in restoring and protecting Oregon's environment.

Sincerely,



Keith Johnson, Manager
Northwest Region Cleanup Section

cc: Dan Hafley, DEQ
Ken Shump, CH2M HILL
David Obern, PDC
Melissa Kleven, Exponent

ECSI file# 2183

